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Before the
Federal Communications Commission
Washington, DC 20554

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JUN 15 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.

(Pacific City, Oregon)

MM Docket No. 01-106 /
RM-10105

To: The Chief, Allocations Branch, Mass Media Bureau

COMMENTS AND COUNTERPROPOSAL

Thunderegg Wireless, L.L.C. ("Thunderegg"), hereby submits its comments and counterproposal pursuant to the Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding released April 27, 2001 (DA 01-1093).

Thunderegg is the licensee of KJUN(FM), Tillamook, Oregon, which holds a construction permit (BPH-20000807AFL) to operate on Channel 281C3 at Scappoose, Oregon. On April 27, 2001, Thunderegg filed a "one-step" application (BMPH-20010427AAQ) for a modification of the permit to upgrade KJUN to Channel 281C2 at Scappoose.¹ As is shown in the attached Engineering Statement of Hatfield and Dawson, the upgrade would produce a net service gain of 57,185 persons and 3716 square kilometers within the predicted 60 dBu contour of KJUN.

Both the allotment point and the transmitter site specified in the KJUN upgrade application are "short-spaced" with the allotment of Channel 282A to Pacific City, Oregon,

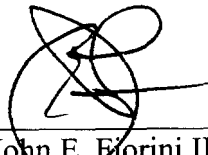
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proposed in the NPRM; consequently, the upgrade application and the proposed allotment are mutually-exclusive.² However, this conflict can be resolved by allotment of Channel 227A to Pacific City instead of Channel 282A.³ Such an allotment would represent a “win-win” since it would both (i) provide a first local transmission service to Pacific City and (ii) enable KJUN to improve its service.

For the reasons stated, Thunderegg requests that the FM Table of Allotments be amended, pursuant to this counterproposal, to read as follows:

<u>Community</u>	<u>Channel No.</u>
Scappoose, Oregon	281C2
Pacific City, Oregon	227A

Respectfully submitted,



John E. Florini III
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006
202-719-7145

Dated: June 15, 2001

¹ The application was filed as part of a “related group” of contingent applications pursuant to Section 73.3517(e); the “related” application is for a minor modification of KXDD(FM), Yakima, Washington (BPH-2001427AAR).

² There is no conflict between the proposed Pacific City allotment and the KXDD modification application.

³ Channel 227A can be allotted to Pacific City in compliance with all applicable allocation requirements, and would provide 60 dBu service to 1870 more persons than Channel 282A. See attached Engineering Statement.

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ENGINEERING STATEMENT COUNTERPROPOSAL IN MM DOCKET NO. 01-106

This Engineering Statement has been prepared on behalf of Thunderegg Wireless, LLC ("Thunderegg"), in support of a Counterproposal in MM Docket No. 01-106. This proceeding was initiated by a Petition for Rulemaking filed by John L. Zolkoske ("Zolkoske"), proposing the allotment of Channel 282A at Pacific City, Oregon.

On April 27, 2001, the same day that the Notice of Proposed Rulemaking in this proceeding was released, Thunderegg filed an application for "one-step" Class C2 upgrade (FCC File No. BMPH-20010427AAQ) of its station KJUN, which is authorized for operation on Channel 281C3 at Scappoose, Oregon. Both the Class C2 allotment site and the proposed Class C2 transmitter site for KJUN are short-spaced to the proposed allotment of Channel 282A at Pacific City. Therefore, the KJUN application will be treated as a counterproposal in MM Docket No. 01-106.¹

Channel 281C2 at Scappoose

The attached spacing study demonstrates that Channel 281C2 can be assigned for use at Scappoose using allotment reference coordinates at NL 45° 34' 44" x WL 122° 58' 16", presuming that Channel 282A is not assigned for use at Pacific City. The Scappoose 281C2 allotment site is located 21 kilometers from Scappoose.

The proposed allotment of Channel 281C2 at Scappoose will provide 60 dBu service to 1,471,756 persons in an area of 8,493 km².

¹The KJUN "one step" application was filed as part of a contingent application group with an application for minor modification of station KXDD, which operates on Channel 281C1 at Yakima, Washington (FCC File No. BPH-20010427AAR). The KXDD application has no direct relationship with the Pacific City proposal.

The authorized operation of Channel 281C3 at Scappoose provides 60 dBu service to 1,414,571 persons in an area of 4,777 km².

The gain area associated with the Class C2 upgrade at Scappoose encompasses 90,194 persons in an area of 4,340 km².

The loss area associated with the Class C2 upgrade at Scappoose encompasses 33,009 persons in an area of 624 km². All of the loss area is considered to be well-served, receiving full-time service from stations KGON 222C Portland, KPDQ 229C Portland, KXJM 238C Portland, KKSX 246C, and KWJJ 258C1, among many others.

Alternate Channel at Pacific City

Should the Commission find it appropriate to make an allotment at Pacific City, Channel 227A may be assigned at that community in lieu of Zolkoske's requested Channel 282A. The attached spacing study demonstrates that Channel 227A can be assigned for use at Pacific City using allotment reference coordinates at NL 45° 20' 19" x WL 124° 00' 08". This site is located 15.4 kilometers from Pacific City, an unincorporated coastal community in Tillamook County.

The allotment of Channel 227A at Pacific City will provide 60 dBu service to a higher population than Zolkoske's requested Channel 282A. Channel 282A would provide 60 dBu service to 14,640 persons, while Channel 227A would provide 60 dBu service to 16,510 persons.

Channel: 281C2 104.1 MHz
Latitude: 45 34 44
Longitude: 122 58 16
Safety Zone: 50 km
Job Title: Scappoose 281C2 Reference Site

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Di st (km)	Req (km)
KXPC-FM LIC	LEBANON OR	BLH-940411KA	279C 103.7	100.000 335.0	44-30-20 122-57-38	179.6	119.28 14.28	105 CLEAR
K279AI CP	HAZEL DELL WA	BPFT-000322AAO	279D 103.7	0.040 -3.0	45-37-47 122-40-53	75.8	23.30 0.00	0 TRANS
K280DF LIC	ASTORIA OR	BLFT-880909TB	280D 103.9	0.110 DA 251.0	46-15-46 123-53-19	317.3	104.13 0.00	0 TRANS
KVAS LIC	ILWACO WA	BLH-010125ABL	280C3 103.9	10.000 52.0	46-18-51 124-03-07	314.8	117.06 0.06	117 CLOSE
K283AI LIC	LONGVIEW, ETC. WA	BLFT-830718NE	280D 103.9	0.010 255.0	46-10-10 123-01-01	356.9	65.74 0.00	0 TRANS
K281AH LIC	FLORENCE OR	BLFT-980518TE	281D 104.1	0.060 DA 235.0	43-57-20 124-04-26	206.1	200.41 0.00	0 TRANS
NEW-T APP	HOOD RIVER OR	BPFT-970910TE	281D 104.1	0.250 87.0	45-42-14 121-31-18	82.5	113.86 0.00	0 TRANS
K281AF LIC	OAKRIDGE OR	BLFT-960223TB	281D 104.1	0.180 667.0	43-46-35 122-24-13	167.2	205.29 0.00	0 TRANS
KRRRC LIC	PORTLAND OR	BLED-980226KB	281D 104.1	0.010 -29.0	45-28-51 122-37-51	112.2	28.73 0.00	0 CLS=D
KJUN VACAN	SCAPPOOSE OR	-	281C2 104.1	0.000 0.0	45-34-44 122-58-16	0.0	0.00 -190.00	190 SHORT
KJUN APP	SCAPPOOSE OR	BMPH-010427AAQ	281C2 104.1	7.000 386.0	45-29-20 122-41-40	114.8 SS	23.81 -166.19	190 SHORT
KJUN CP	SCAPPOOSE OR	BPH-000807AFL	281C3 104.1	1.650 386.0	45-29-20 122-41-40	114.8	23.81 -153.19	177 SHORT

SEARCH PARAMETERS FM Database Date: 010605

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Longitude: 122 58 16

Job Title: Scappoose 281C2 Reference Site

44444 END OF FM SPACING STUDY FOR CHANNEL 281 44444

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FM Database Date: 010605

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44444 END OF FM SPACING STUDY FOR CHANNEL 227 44444

Statement of Engineer

This Engineering Statement, supporting a Counterproposal in MM Docket No. 01-106, has been prepared on behalf of Thunderegg Wireless, LLC. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Alaska.

Signed this 13th day of June, 2001.



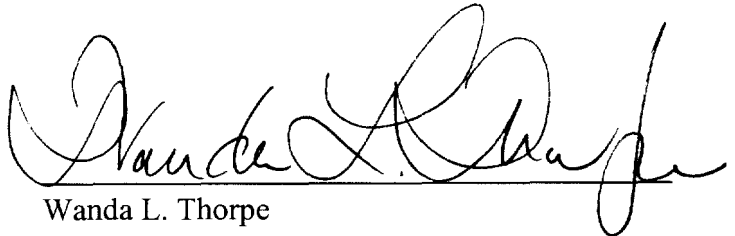
Stephen S. Lockwood, P.E.

Hatfield & Dawson Consulting Engineers

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2001, I caused copies of the foregoing
Comments and Counterproposal to be mailed via first-class postage prepaid mail to the
following:

John L. Zolkoske
915 N. Douglas Ave.
Stayton, OR 97383



Wanda L. Thorpe